

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh  
Chapter 11

**JUNE 2025 FEE STATEMENT OF RICHMAN & RICHMAN LLC  
AS COUNSEL TO DEBTOR**

Applicant:	Richman & Richman LLC
Counsel for:	Wisconsin & Milwaukee Hotel LLC
Period for compensation and reimbursement:	June 1, 2025 through June 30, 2025
Amount of compensation sought as actual, reasonable, and necessary:	<b>\$112,426.50</b>
Amount of reimbursement expenses sought as actual, reasonable, and necessary:	<b>\$557.62</b>
Total interim approval requested:	<b>\$112,984.12</b>

Dated this 10<sup>th</sup> day of July 2025.

**RICHMAN & RICHMAN**  
**Attorneys for the Debtor**

By: /s/ Eliza M. Reyes  
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Claire Ann Richman  
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# Richman & Richman LLC

122 W Washington Ave, Suite 850  
Madison, WI 53703-2732

# INVOICE

Invoice # 1496  
Date: 07/10/2025  
Due On: 08/09/2025

Wisconsin & Milwaukee Hotel LLC  
c/o Jackson Street Management LLC  
Attn: Mr. Edward G. Carow  
731 N. Jackson Street, Suite 420, Milwaukee WI53202

## Wisconsin & Milwaukee Hotel LLC/-2024.00023

### Chapter 11

#### Services

Type	Date	Notes	Timekeeper	Quantity	Rate	Total
Service	06/01/2025	1105 - Plan & Disclosures: Work on various matters for confirmation issues and schedule, including discovery, witness lists and testimony, related legal issues and analyses (1.0); prep of extensive issues discussion email to client team re same and related issues (1.1)	MPR	2.10	\$795.00	\$1,669.50
Service	06/02/2025	1108 - Employment, Billing & Compensation: Review docket and confer with MPR in determination of status of order on April 2025 fees and earliest eligibility to file third interim R&R fee application (.2); review R&R invoices from January-April 2025 and prepare spreadsheet of fees & cost breakdown for supporting documentation for third interim fee application (2.9)	DTF	3.10	\$250.00	\$775.00
Service	06/02/2025	1105 - Plan & Disclosures: Research and draft memo re Section 1111(b) interest	DJC	3.10	\$225.00	\$697.50
Service	06/02/2025	1105 - Plan & Disclosures: Continue drafting memo re section 1111(b) interests	DJC	0.80	\$225.00	\$180.00
Service	06/02/2025	1106 - Misc Motions & Court Hearings: Listen in status conference	DJC	1.40	\$0.00	\$0.00
Service	06/02/2025	1105 - Plan & Disclosures: Continue	DJC	1.90	\$225.00	\$427.50

research re absolute priority rule						
Service	06/02/2025	1110 - Claim Management Issues: Draft discovery requests to White Lodging in connection with administrative expense motion and bonus payments.	DTF	1.30	\$250.00	\$325.00
Service	06/02/2025	1105 - Plan & Disclosures: t/c w/W. Pederson re projections (.1); court hearing re WL bonus motion process and overall schedule (1.4)	MPR	1.50	\$795.00	\$1,192.50
Service	06/02/2025	1106 - Misc Motions & Court Hearings: prep of discovery demands for WL bonus motion adjudication (.1); t/conf w/A. Daleo re bonus motion settlement possibility (.2); emails w/ client team re status of bonus motion (.1)	MPR	0.40	\$795.00	\$318.00
Service	06/02/2025	1112 - Debtor Meetings & Communications: Client teams strategy meeting	MPR	0.70	\$795.00	\$556.50
Service	06/03/2025	1105 - Plan & Disclosures: Draft memo re absolute priority rule	DJC	2.90	\$225.00	\$652.50
Service	06/03/2025	1110 - Claim Management Issues: Draft motion to compel discovery from White Lodging on document requests pertaining to claim objections.	DTF	1.60	\$250.00	\$400.00
Service	06/03/2025	1106 - Misc Motions & Court Hearings: T/conf w/N. Brown re bonus and contract litigation issues/ negotiations (.3); prep of email to client team re same (.2); work on motion to compel production of sale agreement from WL (.9); work on discovery demands to WL re bonus motion (.9)	MPR	2.30	\$795.00	\$1,828.50
Service	06/03/2025	1105 - Plan & Disclosures: teams mtg w/D. Friedland and W. Pederson re plan tasks/strategies (.4); related emails on plan discovery w/client team (.1); settlement t/conf w/F. DiCastri and prep of email to client team re same (.5)	MPR	1.00	\$795.00	\$795.00
Service	06/04/2025	1105 - Plan & Disclosures: Continue to draft and edit the memo re absolute priority rule	DJC	1.80	\$225.00	\$405.00
Service	06/04/2025	1110 - Claim Management Issues: Revise and update motion to compel	DTF	3.50	\$250.00	\$875.00

		discovery from White Lodging on document requests pertaining to claim objections (1.8); review WL expert deposition, email communications with WL counsel and all related documents for preparation of exhibits to motion to compel (1.2); prepare draft Certification under FRCP 7037(a)(1) in support of motion to compel (.5)				
Service	06/04/2025	1105 - Plan & Disclosures: Research re auction of new equity interest	DJC	4.50	\$225.00	\$1,012.50
Service	06/04/2025	1112 - Debtor Meetings & Communications: Client team zoom mtg on all issues/matters/strategies (.8); followup zoom mtg w/D. Friedland and W. Pederson (.2);	MPR	1.00	\$795.00	\$795.00
Service	06/04/2025	1106 - Misc Motions & Court Hearings: further work on motion to compel production from WL of 2021 Sale Agreement	MPR	0.60	\$795.00	\$477.00
Service	06/04/2025	1105 - Plan & Disclosures: review new value research (.2); further t/conf w/W Pedersen re feasibility analysis (.2); t/conf w/J. Jaeger and C. Hutson re appraisal status (.1)	MPR	0.50	\$795.00	\$397.50
Service	06/04/2025	1108 - Employment, Billing & Compensation: Review and revise draft of Second Supplemental Application to Employ Sikich as Accountants for Debtor and Declaration of Gerald Schmit (.8); prepare email to Sikich professionals forwarding same for their review and approval (.2).	EMR	1.00	\$495.00	\$495.00
Service	06/05/2025	1105 - Plan & Disclosures: Research re rights offering	DJC	3.00	\$225.00	\$675.00
Service	06/05/2025	1105 - Plan & Disclosures: Continue research re rights offering	DJC	4.30	\$225.00	\$967.50
Service	06/05/2025	1106 - Misc Motions & Court Hearings: Prepare disclosure of witnesses document to serve on White Lodging per court order on the evidentiary hearing on White Lodging's motion to allow administrative expense claim	DTF	0.40	\$250.00	\$100.00
Service	06/05/2025	1105 - Plan & Disclosures: work on witness disclosure doc for	MPR	1.00	\$795.00	\$795.00

		confirmation hearings and related emails (.5); review draft report from D. Friedland re plan confirmation issues (.3); t/c w/W. Pederson re feasibility report and prep of email to client team re same (.2)				
Service	06/05/2025	1106 - Misc Motions & Court Hearings: review lender lift stay motion and prep of email to client team re same	MPR	0.20	\$795.00	\$159.00
Service	06/05/2025	1108 - Employment, Billing & Compensation: Finalize Second Supplemental Application to Employ Sikich as Accountants for Debtor and Supporting Declaration of Gerald Schmit for filing.	EMR	0.30	\$495.00	\$148.50
Service	06/05/2025	1106 - Misc Motions & Court Hearings: Review Motion for Relief from Stay as to Hotel filed by Computershare to address and object to same (.4); prepare email to Sikich professionals advising of filing and objection deadline for same (.1).	EMR	0.50	\$495.00	\$247.50
Service	06/06/2025	1105 - Plan & Disclosures: Research and draft memo re rights offering	DJC	2.40	\$225.00	\$540.00
Service	06/06/2025	1106 - Misc Motions & Court Hearings: Review White Lodging's discovery requests and prepare preliminary draft responses to White Lodging's interrogatories, requests for production, and requests for admission re: administrative expense claim motion	DTF	1.40	\$250.00	\$350.00
Service	06/06/2025	1105 - Plan & Disclosures: Review court order on plan confirmation hearing to assess all necessary requirements and deadlines for expert report disclosures and witness lists.	DTF	0.40	\$250.00	\$100.00
Service	06/06/2025	1105 - Plan & Disclosures: Draft memo re rights offering	DJC	3.60	\$225.00	\$810.00
Service	06/06/2025	1108 - Employment, Billing & Compensation: Review Second Interim Fee Application in preparation to draft Third Interim Fee Application.	AB	0.20	\$225.00	\$45.00
Service	06/06/2025	1106 - Misc Motions & Court Hearings: Finalize witness disclosure pleading in connection with White Lodging's motion for allowance of	DTF	0.40	\$250.00	\$100.00

		administrative expense claim for service on White Lodging's counsel.				
Service	06/06/2025	1105 - Plan & Disclosures: Prepare and finalize expert reports for disclosure and service on counsel pursuant to order on plan confirmation hearing.	DTF	0.50	\$250.00	\$125.00
Service	06/06/2025	1108 - Employment, Billing & Compensation: Continue preparation of spreadsheet of fees & cost breakdown in support of third interim R&R fee application.	DTF	0.60	\$250.00	\$150.00
Service	06/06/2025	1105 - Plan & Disclosures: prep of letter to Court re confirmation hearing schedule (.9); final prep for service and filing of witness lists and expert reports, review of other filed materials and related emails (1.5)	MPR	2.40	\$795.00	\$1,908.00
Service	06/06/2025	1112 - Debtor Meetings & Communications: Prep of email to client team re status/strategy (.2); zoom mtg w/client team re same (.7); prep of further email to client team re same and proposed letter (.3)	MPR	1.20	\$795.00	\$954.00
Service	06/09/2025	1108 - Employment, Billing & Compensation: Prepare draft template of R&R monthly fee statement for May 2025.	DTF	0.10	\$250.00	\$25.00
Service	06/09/2025	1108 - Employment, Billing & Compensation: Continue preparation of spreadsheet of fees & cost breakdown in support of third interim R&R fee application.	DTF	0.80	\$250.00	\$200.00
Service	06/09/2025	1106 - Misc Motions & Court Hearings: Review docket and prepare all entered court orders for attorney review and preparation for court's status hearing on lenders' motion for relief from stay, reconsideration of White Lodging's bonus motion, and plan confirmation schedule and deadlines.	DTF	0.70	\$250.00	\$175.00
Service	06/09/2025	1103 - Petition, Schedules & Financials: Review schedules and documents for guarantees of secured debt other than client	KKH	0.20	\$225.00	\$45.00
Service	06/09/2025	1110 - Claim Management Issues: Review POC's for guarantees of	KKH	0.20	\$225.00	\$45.00

secured debt other than client						
Service	06/09/2025	1108 - Employment, Billing & Compensation: Conference with DTF re: fee application instructions (1.0); draft third interim R&R fee agreement (1.0).	AB	2.00	\$0.00	\$0.00
Service	06/09/2025	1105 - Plan & Disclosures: Work on confirmation hearing discovery responses to WL and Computershare (2.0); t/conf w/J. Cordova and R. Erkert re discovery responses (.5); further work on all WL and Computershare discovery (3.2)	MPR	5.70	\$795.00	\$4,531.50
Service	06/10/2025	1106 - Misc Motions & Court Hearings: Review WL's response to partial summary judgment and conduct research re burden of proof on proof of claims	DJC	2.20	\$225.00	\$495.00
Service	06/10/2025	1108 - Employment, Billing & Compensation: Review monthly invoice, and update and finalize May 2025 fee statement.	DTF	0.40	\$250.00	\$100.00
Service	06/10/2025	1106 - Misc Motions & Court Hearings: Continue research re WL's response to partial summary judgment	DJC	1.00	\$225.00	\$225.00
Service	06/10/2025	1105 - Plan & Disclosures: Draft interrogatories and requests for production of documents to Lenders pursuant to plan confirmation hearing litigation (1.3); prepare all documents with bates numbering responsive to Lenders' requests for production of documents (1.2).	DTF	2.50	\$250.00	\$625.00
Service	06/10/2025	1106 - Misc Motions & Court Hearings: Draft and edit confidentiality stipulation	DJC	1.50	\$225.00	\$337.50
Service	06/10/2025	1106 - Misc Motions & Court Hearings: Attend status conference on confirmation schedule	DJC	1.20	\$0.00	\$0.00
Service	06/10/2025	1108 - Employment, Billing & Compensation: Finalize draft of third interim R&R fee application.	AB	3.70	\$225.00	\$832.50
Service	06/10/2025	1105 - Plan & Disclosures: Zoom mtg w/J. Jaeger and C. Hutson re expert rebuttal report questions (.3); Prep of notes for status conf and email to	MPR	5.00	\$795.00	\$3,975.00



		client team (1.2); further work on discovery responses to WL and Computershare (1.4); review new value research (.2); status conf on overall schedule (1.0); prep of email to F. DiCatri and S. Macnamara re deposition schedule and settlement discussions (.2); R&R team mtg to review assignments for confirmation schedule and briefing (.7)				
Service	06/10/2025	1112 - Debtor Meetings & Communications: prep of email report to client team re same (.2); emails to client team and witnesses re scheduling for discovery and hearing purposes based on status conference (.3)	MPR	0.50	\$795.00	\$397.50
Service	06/10/2025	1108 - Employment, Billing & Compensation: work on supp disinterestedness app re FTI	MPR	0.70	\$795.00	\$556.50
Service	06/10/2025	1108 - Employment, Billing & Compensation: Prepare, revise, and finalize Third Supplemental Declaration of MPR in Support of Application to Employ Richman & Richman as bankruptcy counsel for the Debtor.	EMR	1.20	\$495.00	\$594.00
Service	06/10/2025	1106 - Misc Motions & Court Hearings: Represent Debtor at hearing on Computershare's Motion for Relief from Stay.	EMR	1.20	\$495.00	\$594.00
Service	06/11/2025	1105 - Plan & Disclosures: Conduct research re rights offering procedure and compliance issues	DJC	0.60	\$225.00	\$135.00
Service	06/11/2025	1108 - Employment, Billing & Compensation: Draft app to employ SSG as investment banker	DJC	0.60	\$225.00	\$135.00
Service	06/11/2025	1108 - Employment, Billing & Compensation: Prepare declaration template in support of app to employ SSG	DJC	0.80	\$225.00	\$180.00
Service	06/11/2025	1108 - Employment, Billing & Compensation: Draft notice of app to employ SSG	DJC	0.30	\$225.00	\$67.50
Service	06/11/2025	1108 - Employment, Billing & Compensation: Review pleadings and assist in preparation of draft Application to Employ SSG as	DTF	0.40	\$250.00	\$100.00

		investment banker for the purpose of restructuring and managing an equity rights offering.				
Service	06/11/2025	1105 - Plan & Disclosures: Continue research re rights offering and backstop commitment agreement	DJC	2.80	\$225.00	\$630.00
Service	06/11/2025	1105 - Plan & Disclosures: T/conf w/ S. Victor re new value questions/ strategies (.2); review lender proposed stipulation of facts, and prep of email to D. Cai re same (.3); email exchanges w/F. DiCastrì re dep schedule (.2); review and finalize discovery responses to Computershare (.5)	MPR	1.20	\$795.00	\$954.00
Service	06/12/2025	1105 - Plan & Disclosures: Further research re rights offering procedures and structures	DJC	6.00	\$225.00	\$1,350.00
Service	06/12/2025	1108 - Employment, Billing & Compensation: Review invoices and revise and update fees and costs breakdown for exhibit to third interim R&R fee application.	DTF	0.90	\$250.00	\$225.00
Service	06/12/2025	1108 - Employment, Billing & Compensation: Edit app to employ SSG Capitol as Investment Banker for Debtor	DJC	1.30	\$225.00	\$292.50
Service	06/12/2025	1105 - Plan & Disclosures: Review sample confirmation brief (0.5); review plan, disclosure statement, and creditor objections (2.3).	AB	2.80	\$225.00	\$630.00
Service	06/12/2025	1108 - Employment, Billing & Compensation: Revise third interim R&R Fee Application.	AB	0.40	\$225.00	\$90.00
Service	06/12/2025	1105 - Plan & Disclosures: Work on discovery schedule for confirmation witnesses, including various emails to witnesses and to F. DiCastrì (.8); research plan amendment issues (.4)	MPR	1.20	\$795.00	\$954.00
Service	06/12/2025	1112 - Debtor Meetings & Communications: client team status/ strategy meeting	MPR	0.70	\$795.00	\$556.50
Service	06/13/2025	1105 - Plan & Disclosures: Continue research re rights offering structures	DJC	2.20	\$225.00	\$495.00
Service	06/13/2025	1105 - Plan & Disclosures: Review case file and due diligence lender's	DJC	4.40	\$225.00	\$990.00

		proposed stipulation of undisputed facts					
Service	06/13/2025	1108 - Employment, Billing & Compensation: Review and revise third interim R&R fee application.	AB	0.20	\$225.00	\$45.00	
Service	06/13/2025	1105 - Plan & Disclosures: Review case file in preparation for drafting confirmation brief (0.9); Research re: interest rates for cramdown loans and 1111(b) elections (2.4).	AB	3.30	\$225.00	\$742.50	
Service	06/13/2025	1105 - Plan & Disclosures: Emails w/ F. DiCatri and client team re proposed dep schedule (.4); work on discovery requests to lenders (2.3)	MPR	2.70	\$795.00	\$2,146.50	
Service	06/13/2025	1108 - Employment, Billing & Compensation: Prepare email to Scott Victor at SSG providing information on Debtor's bankruptcy filing for engagement agreement with Debtor.	EMR	0.20	\$495.00	\$99.00	
Service	06/14/2025	1110 - Claim Management Issues: review and forward to MPR memo regarding loan maturity dates	CAR	0.30	\$625.00	\$187.50	
Service	06/14/2025	1105 - Plan & Disclosures: Work on plan amendment issues and related research	MPR	1.00	\$795.00	\$795.00	
Service	06/14/2025	1108 - Employment, Billing & Compensation: Prepare emails (x2) to Scott Victor at SSG Capital Advisors to provide information for conflict check and copies of proposed Plan to continue working on Application to Employ SSG.	EMR	0.40	\$495.00	\$198.00	
Service	06/15/2025	1105 - Plan & Disclosures: Work on confidentiality stip for AA contract information	MPR	0.30	\$795.00	\$238.50	
Service	06/16/2025	1105 - Plan & Disclosures: Research re computershare loans and maturity issues and edit joint stipulation of facts for confirmation hearing	DJC	1.30	\$225.00	\$292.50	
Service	06/16/2025	1105 - Plan & Disclosures: Research re reinstatement of secured loans	DJC	5.10	\$225.00	\$1,147.50	
Service	06/16/2025	1108 - Employment, Billing & Compensation: Email to D. Friedland re: May 2025 fee statement for supporting documentation for filing May 2025 MOR (.1); email to A.	DTF	1.20	\$250.00	\$300.00	

		Sarwan-Jones re: filing of third interim fee application of EA Group and request for invoices (.1); revise and update third interim fee application of R&R and update cost & fee breakdown spreadsheets (.5); review Sikich invoice and begin drafting second interim fee application of Sikich (.5)				
Service	06/16/2025	1105 - Plan & Disclosures: Research legal standards for creditor classification under section 1129(b)(2).	AB	3.40	\$225.00	\$765.00
Service	06/16/2025	1105 - Plan & Disclosures: Research re: interest rate for cramdown loan.	AB	2.10	\$225.00	\$472.50
Service	06/16/2025	1105 - Plan & Disclosures: Review all discovery and document production provided to lenders in follow up to lenders' counsel's inquiry and Mallery's response re: potential additional documents needing to be supplemented.	DTF	0.40	\$250.00	\$100.00
Service	06/16/2025	1105 - Plan & Disclosures: Continue research re: interest rate for cramdown loan.	AB	3.20	\$225.00	\$720.00
Service	06/16/2025	1105 - Plan & Disclosures: Mtgs w/D. Cai and emails re loan issues and research (.3); mtg w/A. Brogan re cramdown interest research, and prep of email to D. Friedland re same (.3); emails w/F. DiCasteri re discovery, confi stip and dep schedule (.3)	MPR	0.90	\$795.00	\$715.50
Service	06/17/2025	1105 - Plan & Disclosures: Continue research re computershare loans	DJC	4.20	\$225.00	\$945.00
Service	06/17/2025	1108 - Employment, Billing & Compensation: Continue drafting second interim fee application of Sikich (1.3); draft notice of second interim fee application of Sikich (.2); review ICAP's invoice and draft second interim fee application of ICAP (1.2); draft notice of second interim fee application of ICAP (.2); revise and update third interim fee application of R&R (.5)	DTF	3.40	\$250.00	\$850.00
Service	06/17/2025	1105 - Plan & Disclosures: Research re: interest rates for cramdown loans (2.2); Draft confirmation brief re: the same (1.0).	AB	3.20	\$225.00	\$720.00

Service	06/17/2025	1105 - Plan & Disclosures: Draft confirmation brief	DJC	2.80	\$225.00	\$630.00
Service	06/17/2025	1105 - Plan & Disclosures: Complete draft of confirmation brief section on creditor classification (5); edit AJB confirmation brief section (0.3); review bond indenture agreement with DJC (0.2).	AB	5.50	\$225.00	\$1,237.50
Service	06/17/2025	1105 - Plan & Disclosures: Research re: Section 1129(b)(2)(B)(i) and absolute priority rule.	AB	0.80	\$225.00	\$180.00
Service	06/17/2025	1105 - Plan & Disclosures: emails w/ F. DiCasteri and Mallery re discovery Qs (.2); t/conf w/F. DiCasteri re potential resolution and email to client team re same (.3)	MPR	0.50	\$795.00	\$397.50
Service	06/17/2025	1112 - Debtor Meetings & Communications: t/conf w. M. Flaherty, R. Erkert, J. Cordova re status/strategy	MPR	0.50	\$795.00	\$397.50
Service	06/17/2025	1108 - Employment, Billing & Compensation: Receive and review proposed engagement agreement between Debtor and SSG Capital as Investment Banker for Debtor (.2); continue working on Application to Employ SSG Capital as Investment Banker for Debtor and Declaration of J. Scott Victor in support of Application (1.2)	EMR	1.40	\$495.00	\$693.00
Service	06/17/2025	1108 - Employment, Billing & Compensation: Review ICAP invoice for services rendered to Debtor as special accountant to prepare ICAP's second interim fee application.	EMR	0.20	\$495.00	\$99.00
Service	06/18/2025	1105 - Plan & Disclosures: Continue to draft confirmation brief	DJC	6.50	\$225.00	\$1,462.50
Service	06/18/2025	1108 - Employment, Billing & Compensation: Draft proposed order granting application to employ SSG Capital as investment banker for the debtor (.4); review, revise and update application to employ SSG Capital, declaration of S. Victor, and engagement letter in preparation for final review and filing with court (1.5)	DTF	1.90	\$250.00	\$475.00
Service	06/18/2025	1105 - Plan & Disclosures: Complete draft of creditor classification section	AB	1.00	\$225.00	\$225.00

		of confirmation brief.				
Service	06/18/2025	1102 - Case Administration / US Trustee: Finalize May 2025 MOR with supporting documentation and file with the court (.3); email with EA Group and client re: MOR filing (.1)	DTF	0.40	\$250.00	\$100.00
Service	06/18/2025	1108 - Employment, Billing & Compensation: Revise and update third interim fee application of R&R.	DTF	0.80	\$250.00	\$200.00
Service	06/18/2025	1108 - Employment, Billing & Compensation: work on SSG engagement app and related issues (1.4); further emails re SSG engagement matters (.3); finalize SSG engagement app and papers (.8)	MPR	2.50	\$795.00	\$1,987.50
Service	06/18/2025	1112 - Debtor Meetings & Communications: client team zoom call re SSG and related issues	MPR	0.70	\$795.00	\$556.50
Service	06/18/2025	1105 - Plan & Disclosures: t/conf w/ lender counsel re discovery requests; and followup emails re same	MPR	0.60	\$795.00	\$477.00
Service	06/18/2025	1108 - Employment, Billing & Compensation: Prepare further revisions to Application to Employ SSG Capital as Investment Banker for Debtors and Supporting Declaration of J. Scott Victor and finalize same for filing.	EMR	1.50	\$495.00	\$742.50
Service	06/19/2025	1105 - Plan & Disclosures: Edit confirmation brief	DJC	1.10	\$225.00	\$247.50
Service	06/19/2025	1105 - Plan & Disclosures: Continue research re rights offering structure	DJC	5.30	\$225.00	\$1,192.50
Service	06/19/2025	1105 - Plan & Disclosures: Draft, finalize, and file supplemental witness list for plan confirmation hearing.	DTF	0.50	\$250.00	\$125.00
Service	06/19/2025	1108 - Employment, Billing & Compensation: Revise and update third interim R&R fee application with exhibits.	DTF	1.10	\$250.00	\$275.00
Service	06/19/2025	1105 - Plan & Disclosures: Review combined draft of confirmation brief (0.2); research secondary sources on rights offerings, provide to DJC (0.3).	AB	0.50	\$225.00	\$112.50
Service	06/19/2025	1105 - Plan & Disclosures: Review and revise confirmation brief draft.	AB	0.70	\$225.00	\$157.50

Service	06/19/2025	1106 - Misc Motions & Court Hearings: Review WL's renewed motion to compel debtor to assume or reject administrative services agreement.	AB	0.20	\$225.00	\$45.00
Service	06/19/2025	1112 - Debtor Meetings & Communications: prep of email to client team re SSG motion and WL motion to compel assumption/rejection	MPR	0.20	\$795.00	\$159.00
Service	06/20/2025	1105 - Plan & Disclosures: Draft memos re rights offering structure & absolute priority rule compliance	DJC	2.00	\$225.00	\$450.00
Service	06/20/2025	1105 - Plan & Disclosures: Continue research re rights offering (1.5); attend meeting with investment bankers (.3)	DJC	1.80	\$225.00	\$405.00
Service	06/20/2025	1105 - Plan & Disclosures: Additional research re rights offering, disclosure statement & ch 11 plan	DJC	2.10	\$225.00	\$472.50
Service	06/20/2025	1105 - Plan & Disclosures: Review and prepare response to lender's objection (.7); additional research re plan and disclosure statement (.5)	DJC	1.20	\$225.00	\$270.00
Service	06/20/2025	1105 - Plan & Disclosures: Research re: cramdown interest rate.	AB	0.20	\$225.00	\$45.00
Service	06/20/2025	1108 - Employment, Billing & Compensation: review Lender obj to SSG and prep of emails re same	MPR	0.50	\$795.00	\$397.50
Service	06/20/2025	1105 - Plan & Disclosures: Zoom w/D. Cai, N. Gupta and S. Victor of SSG re rights offering (.3); prep of rebuttal report for service (.1)	MPR	0.40	\$795.00	\$318.00
Service	06/20/2025	1108 - Employment, Billing & Compensation: Conduct brief review of Computershare Trust Company's objection to Application to Employ SSG Capital as Investment Banker for the Debtor to address same.	EMR	0.20	\$495.00	\$99.00
Service	06/21/2025	1105 - Plan & Disclosures: Work on rights offering provisions for plan	MPR	1.50	\$795.00	\$1,192.50
Service	06/22/2025	1105 - Plan & Disclosures: Further work on amendments to plan, and prep of email to client team re same	MPR	2.70	\$795.00	\$2,146.50
Service	06/23/2025	1105 - Plan & Disclosures: Research re how the market test requirement	DJC	4.60	\$225.00	\$1,035.00

		affect the procedures of a rights offering				
Service	06/23/2025	1108 - Employment, Billing & Compensation: Draft proposed order conditionally approving May 2025 R&R fees; finalize and file with court.	DTF	0.30	\$250.00	\$75.00
Service	06/23/2025	1108 - Employment, Billing & Compensation: Prepare and file notice of withdrawal of application to employ SSG Capital Advisors (.4); prepare and file notice of withdrawal of supplemental witness list (.3)	DTF	0.70	\$250.00	\$175.00
Service	06/23/2025	1108 - Employment, Billing & Compensation: Prepare withdrawals of Application to Employ SSG Advisors and Supplemental Witness List for Plan Confirmation Hearing (naming J. Scott Victor as witness).	EMR	0.50	\$495.00	\$247.50
Service	06/23/2025	1108 - Employment, Billing & Compensation: Prepare Application to Employ Much Shelist as Special Counsel to WMH and Declaration in Support of David T. Brown in Support of Application.	EMR	1.20	\$495.00	\$594.00
Service	06/23/2025	1108 - Employment, Billing & Compensation: emails and t/c w/D. Brown re engagement of Much firm as special corporate/securities counsel	MPR	0.30	\$795.00	\$238.50
Service	06/23/2025	1105 - Plan & Disclosures: revise discovery request to Lenders, and prep of email to S. Macnamara re same (.3); further work on amendments to plan (.3); review rights offering issues w/D. Cai (.1)	MPR	0.70	\$795.00	\$556.50
Service	06/23/2025	1112 - Debtor Meetings & Communications: Prep of email to client team re Qs for meeting (.2); zoom mtg w/client team re status/strategy (.7); followup call w/J. Cordova and R. Erkert re same (.2)	MPR	1.10	\$795.00	\$874.50
Service	06/24/2025	1105 - Plan & Disclosures: Continue research re rights offering and compliance with the market test requirement	DJC	7.40	\$225.00	\$1,665.00
Service	06/24/2025	1108 - Employment, Billing & Compensation: Prepare and file proposed order granting second	DTF	0.40	\$250.00	\$100.00



		supplemental application to employ Sikich LLC.				
Service	06/24/2025	1105 - Plan & Disclosures: Draft Notices of Deposition to all Lenders' plan confirmation hearing witnesses for pending deposition testimony.	DTF	0.50	\$250.00	\$125.00
Service	06/24/2025	1108 - Employment, Billing & Compensation: Revise and update second interim fee application of Sikich (.4); revise and update second interim fee application of ICAP (.3)	DTF	0.70	\$250.00	\$175.00
Service	06/24/2025	1105 - Plan & Disclosures: Call with D. Friedland and W. Pederson re: cramdown interest rate.	AB	0.50	\$225.00	\$112.50
Service	06/24/2025	1105 - Plan & Disclosures: Continue researching cramdown interest rate.	AB	2.20	\$225.00	\$495.00
Service	06/24/2025	1108 - Employment, Billing & Compensation: Revise and update third interim R&R fee application with exhibits.	DTF	1.80	\$250.00	\$450.00
Service	06/24/2025	1109 - Asset Analysis & Recovery: Prepare organizational documents to Much Shelist.	DTF	0.20	\$250.00	\$50.00
Service	06/24/2025	1105 - Plan & Disclosures: zoom mtg w/B. Gilbert and K. Mason, counsel to Marriott, re status of plan and rights offering, other open issues (.5); teams mtg w/Much team re rights offering (.4)	MPR	0.90	\$795.00	\$715.50
Service	06/24/2025	1108 - Employment, Billing & Compensation: Work on Much engagement pleadings	MPR	0.60	\$795.00	\$477.00
Service	06/24/2025	1108 - Employment, Billing & Compensation: Revise and finalize for filing Debtor's Application to Employ Much Shelist, P.C. as special counsel for the Debtor with respect to the equity offering, and supporting Declaration of David T. Brown.	EMR	2.00	\$495.00	\$990.00
Service	06/25/2025	1105 - Plan & Disclosures: Draft memo re rights offering case studies	DJC	2.30	\$225.00	\$517.50
Service	06/25/2025	1108 - Employment, Billing & Compensation: Update second interim fee application of Sikich for review, approval, and signature of J. Vorlob (.4); update second interim fee	DTF	0.70	\$250.00	\$175.00

		application of ICAP for review, approval, and signature of S. Geracie (.3)				
Service	06/25/2025	1105 - Plan & Disclosures: Edit confirmation brief	DJC	1.30	\$225.00	\$292.50
Service	06/25/2025	1105 - Plan & Disclosures: Review loan documents and management agreement and edit stipulation of fact	DJC	3.60	\$225.00	\$810.00
Service	06/25/2025	1106 - Misc Motions & Court Hearings: Prepare preliminary draft objection to White Lodging's motion to assume or reject administrative services agreement.	DTF	0.50	\$250.00	\$125.00
Service	06/25/2025	1105 - Plan & Disclosures: Research re debt/subscription right swap	DJC	0.40	\$225.00	\$90.00
Service	06/25/2025	1105 - Plan & Disclosures: Research and revise confirmation brief.	AB	2.60	\$225.00	\$585.00
Service	06/25/2025	1113 - Executory Contracts: Prepare Motion to Reject WL Management Agreement	JES	3.20	\$325.00	\$1,040.00
Service	06/25/2025	1108 - Employment, Billing & Compensation: Update, finalize, and file second interim fee application for Sikich (.6); Update, finalize, and file second interim fee application for ICAP (.5); Finalize and file third interim fee application for EA Group (.3)	DTF	1.40	\$250.00	\$350.00
Service	06/25/2025	1108 - Employment, Billing & Compensation: Revise, update, finalize, and file third interim fee application of R&R with exhibits.	DTF	1.80	\$250.00	\$450.00
Service	06/25/2025	1105 - Plan & Disclosures: Review 1111b election options and calculations and conference with MPR regarding same	CAR	1.00	\$625.00	\$625.00
Service	06/25/2025	1112 - Debtor Meetings & Communications: Strategy Teams mtg w/D. Friedland and W. Pederson	MPR	0.50	\$795.00	\$397.50
Service	06/25/2025	1105 - Plan & Disclosures: emails w/ F. DiCasteri and D. Fowle re deposition schedule (.2); further review of equity rights research (.2); review proposed plan amendments w/D. Friedland (.1); additional work on plan amendments (2.1); mtg w/CAR re 1111b issues	MPR	3.60	\$795.00	\$2,862.00

		and plan structure (1.0)				
Service	06/25/2025	1113 - Executory Contracts: prep of obj to WL motion to compel assumption/rejection of management agreement	MPR	0.80	\$795.00	\$636.00
Service	06/25/2025	1108 - Employment, Billing & Compensation: Review and finalize Richman & Richman's Third Interim Fee Application as counsel for the Debtor.	EMR	1.20	\$495.00	\$594.00
Service	06/26/2025	1105 - Plan & Disclosures: Research re 1111(b) discount rate	DJC	4.40	\$225.00	\$990.00
Service	06/26/2025	1105 - Plan & Disclosures: Edit Joint Stipulation of Fact	DJC	1.50	\$225.00	\$337.50
Service	06/26/2025	1102 - Case Administration / US Trustee: Call and email exchanges and review of third interim fee application with D. Friedland re: third interim fee application of EA Group, and pending re-submission of same for revision to fee period (.4); finalize and file amended third interim fee application of EA Group (.5)	DTF	0.90	\$250.00	\$225.00
Service	06/26/2025	1105 - Plan & Disclosures: Research and revise confirmation brief.	AB	1.40	\$225.00	\$315.00
Service	06/26/2025	1105 - Plan & Disclosures: Prep of emails to Eisner team re plan amendments of 1111b and other claims (.3); work on stipulated facts doc (1.0); work on plan amendments (.5); zoom mtg w/client team re plan amendments (.6)	MPR	2.40	\$795.00	\$1,908.00
Service	06/26/2025	1113 - Executory Contracts: prep of email to client team re WL damages/ issues	MPR	0.50	\$795.00	\$397.50
Service	06/26/2025	1108 - Employment, Billing & Compensation: Review Computershare Trust Company's Objection to Application to Employ Much Shelist to address same.	EMR	0.20	\$495.00	\$99.00
Service	06/27/2025	1105 - Plan & Disclosures: Research re secured claims treatment & present value	DJC	7.20	\$225.00	\$1,620.00
Service	06/27/2025	1105 - Plan & Disclosures: Finalize and confirm deposition schedule and confirm all details with court reporter	DTF	2.10	\$250.00	\$525.00

		for depositions of lenders' experts and witnesses re: contested plan confirmation hearing (.5); Finalize and send notices of deposition to lenders' counsel (.3); generate list of deposition questions in preparation for deposition of lenders' witness C. Nelson (.7); review discovery responses of lenders, preserve to file production of lenders documents and prepare for client review (.6)				
Service	06/27/2025	1106 - Misc Motions & Court Hearings: Review lender objection to application of employment.	AB	0.10	\$225.00	\$22.50
Service	06/27/2025	1105 - Plan & Disclosures: Conf. with MPR and DC re: 1111(b) election and discount rate (0.3); Research re: the same (2.0).	AB	2.30	\$225.00	\$517.50
Service	06/27/2025	1112 - Debtor Meetings & Communications: client team zoom mtg on status/strategy, including followup calls and mtg re pending issues	MPR	0.50	\$795.00	\$397.50
Service	06/27/2025	1105 - Plan & Disclosures: Emails w/ W. Pederson and client team re claims calculations (.5); mtg w/D. Cai and A. Brogan re research on claims treatment in plan (.2); final work on plan amendments and related research, and numerous and overlapping related emails and calls w/client team and advisors (3.4)	MPR	4.10	\$795.00	\$3,259.50
Service	06/27/2025	1105 - Plan & Disclosures: Finalize redline and clean versions of Debtor's proposed Second Amended Chapter 11 Plan and exhibits to same to prepare same for filing.	EMR	1.20	\$495.00	\$594.00
Service	06/28/2025	1105 - Plan & Disclosures: Review discovery/witness reports and general prep for depositions re plan confirmation hearings (1.5); work on plan supp, and prep of related email to Much team (.5)	MPR	2.00	\$795.00	\$1,590.00
Service	06/29/2025	1105 - Plan & Disclosures: Review Friedland/Pedersen expert reports and t/conf w/D. Friedland re rebuttal reports (.7); email exchange w/Much team re status and strategy for equity offering procedures and backstop commitment (.1); further general	MPR	2.90	\$795.00	\$2,305.50

		preps for impending plan supp and rebuttal reports deadlines, including further review of Nelson report (1.6); work on jt fact stip (.2); review email from F. DiCastrì with questions about amended plan and equity offering, and prep of related email to client team (.3)				
Service	06/30/2025	1105 - Plan & Disclosures: Continue research re treatment of secured claims and feasibility issues	DJC	6.20	\$225.00	\$1,395.00
Service	06/30/2025	1105 - Plan & Disclosures: Edit Joint Stipulation of Facts	DJC	1.00	\$225.00	\$225.00
Service	06/30/2025	1105 - Plan & Disclosures: Research re: cramdown interest rate and revise confirmation brief accordingly.	AB	7.00	\$225.00	\$1,575.00
Service	06/30/2025	1105 - Plan & Disclosures: Provide to D. Friedman of EA Group via email source documents from lender's expert report of C. Nelson.	DTF	0.20	\$250.00	\$50.00
Service	06/30/2025	1113 - Executory Contracts: Prepare Motion to Assume Marriott, review docket for information re Marriott Franchise Agreement	JES	2.30	\$325.00	\$747.50
Service	06/30/2025	1105 - Plan & Disclosures: prep of emails w/client team re lender questions and prep of email to F. DiCastrì re same (.2); review Lender doc prodn (.3); work on fact stip, and prep of email to F. DiCastrì re same (.7)	MPR	1.20	\$795.00	\$954.00
Service	06/30/2025	1106 - Misc Motions & Court Hearings: work on obj to WL renewed motion to compel assumption/ rejection	MPR	0.30	\$795.00	\$238.50
					<b>Quantity Subtotal</b>	<b>307.2</b>
					<b>Services Subtotal</b>	<b>\$112,426.50</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	05/28/2025	Copy Expense: Stretto printing/copying expense: First Interim Fee Application of Mallory S.C. (Doc 557), Exhibit A: Mallory S.C. Invoice (Doc 557-001), and Notice of First Interim Fee Application of Mallory S.C. (Doc 558)	2,226.00	\$0.15	\$333.90

Expense	05/28/2025	Postage Expense: Stretto postage expense: First Interim Fee Application of Mallery S.C. (Doc 557), Exhibit A: Mallery S.C. Invoice (Doc 557-001), and Notice of First Interim Fee Application of Mallery S.C. (Doc 558)	1.00	\$223.72	\$223.72
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**Expenses Subtotal**      **\$557.62**

Time Keeper	Position	Quantity	Rate	Total
Eliza Reyes	Associate	14.4	\$495.00	\$7,128.00
Claire Richman	Partner	1.3	\$625.00	\$812.50
Michael Richman	Partner	67.3	\$795.00	\$53,503.50
James Soo	Associate	5.5	\$325.00	\$1,787.50
Ava Brogan	Non-Attorney	34.1	\$225.00	\$7,672.50
Ava Brogan	Non-Attorney	2.0	\$0.00	\$0.00
Anastasia Bruss	Non-Attorney	0.2	\$225.00	\$45.00
Anastasia Bruss	Non-Attorney	13.2	\$225.00	\$2,970.00
Dian Cai	Law Clerk	125.3	\$225.00	\$28,192.50
Dian Cai	Law Clerk	2.6	\$0.00	\$0.00
David Fowle	Paralegal	40.9	\$250.00	\$10,225.00
Kiranpreet Hayer	Paralegal	0.4	\$225.00	\$90.00

**Quantity Total**      **307.2**

**Subtotal**      **\$112,984.12**

**Total**      **\$112,984.12**

ALL BILLS DUE & PAYABLE UPON RECEIPT UNLESS ARRANGEMENTS ARE MADE WITH COUNSEL.

Please make all amounts payable to: Richman & Richman LLC

**Check/Cash Payments:** Mail to 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732

**Credit Card Payments:** Via CLIO Pay at [www.RandR.law](http://www.RandR.law) (or attached link)

**Wire Instructions:** Account Name: Richman & Richman LLC (General Checking)  
Account Address: 122 W. Washington Ave., Suite 850, Madison, WI 53703-2732  
Bank Name and Address: BMO Harris Bank  
ABA: 071025661 SWIFT Code HATRUS44 Acct No. 4838178298

Please pay within 30 days.